

Klaus H. Hamm, OSB# 091730  
Email: Klaus.hamm@klarquist.com  
KLARQUIST SPARKMAN, LLP  
121 S.W. Salmon St., Ste. 1600  
Portland, Oregon 97204  
Telephone: (503) 595-5300  
Facsimile: (503) 595-5301

John M. Weyrauch, *pro hac vice*  
Email: jmweyrauch@dbclaw.com  
Peter R. Forrest, *pro hac vice*  
Email: pforrest@dbclaw.com  
DICKE, BILLIG & CZAJA, PLLC  
100 South Fifth Street, Suite 2250  
Minneapolis, MN 55402  
Telephone: (612) 573-2000  
Facsimile: (612) 573-2005

*Attorneys for Defendants*  
ROCKLER RETAIL GROUP, INC.  
ROCKLER COMPANIES, INC.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**MAJED QUAIZ,**

Plaintiff,

v.

**ROCKLER RETAIL GROUP, INC. and  
ROCKLER COMPANIES, INC.,**  
Defendants.

Civil Case No.: 3:16-cv-01879-SI

**DECLARATION OF JOHN M.  
WEYRAUCH IN SUPPORT OF  
DEFENDANTS' REPLY IN SUPPORT  
OF MOTION TO COMPEL PLAINTIFF  
TO IDENTIFY ALLEGED TRADE  
SECRET(S) WITH REASONABLE  
PARTICULARITY**

I, John M. Weyrauch, declare as follows:

1. I am an attorney with the law firm of Dicke, Billig & Czaja, and I represent Defendants Rockler Retail Group, Inc. and Rockler Companies, Inc. in this action. The statements made in

DECLARATION OF JOHN M. WEYRAUCH  
In Support of Defendants' Motion to Compel

this declaration are based on facts know to me through my representation in this case.

2. Attached hereto as Exhibit A is a true and correct online form from the Rockler website entitled “How do I submit my idea?”

3. Attached hereto as Exhibit B is a true and correct copy of an email dated July 12, 2012 from webmaster@rockler.com to Majed Quaiz.

4. On or about October 11, 2016, I spoke to Plaintiff’s counsel, Ms. Andrea Meyer, and indicated Rockler was unable to locate any drawings of Plaintiff. I asked Attorney Meyer to provide copies of the drawings referenced in Plaintiff’s Complaint. On October 13, 2016, Attorney Meyer emailed 14 drawings to me. None of the drawings Attorney Meyer provided to me included any markings or otherwise identified the drawings as “CONFIDENTIAL.”

5. Attached hereto as Exhibit C is a true and correct copy of an assignment document filed with the United States Patent and Trademark Office and recorded at Reel 040405, Frame 0457.

6. Attached hereto as Exhibit D is a true and correct copy of the 14 pages of drawings that Plaintiff’s counsel emailed to me on October 13, 2016, representing that they were the same 14 drawings referenced in the Amended Complaint. None of the 14 drawings were identified or marked as “CONFIDENTIAL,” and no claim of confidentiality was made in Plaintiff’s counsel’s email that forwarded the 14 drawings. Defendants’ counsel conferred with Plaintiff’s counsel, who did not object to Defendants’ filing the 14 drawings unsealed.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 8, 2017

s/John M. Weyrauch